

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICIA VELEZ, GERMAIN TORRES,
FRANCISCO BOLANOS, and JOSE
QUIJANO, individually and on behalf of other
employees similarly situated, Plaintiffs
v.

PALERMO ENTERPRISES, INC. AND JOE
GRECO, individually, Defendants

Case No. 15-cv-4997

Judge Kennelly

**JOINT MOTION FOR APPROVAL OF SETTLEMENT
AND ATTORNEYS' FEES AND COSTS**

For the reasons set forth in the Memorandum of Law in Support of the parties' Joint Motion for Approval of Settlement and Attorneys' Fees and Costs, the parties respectfully request that the Court enter an Order:

1. Approving the Settlement Agreement as fair, reasonable, and adequate as it applies to the Settlement Class;
2. Finding that the Notice to be given constitutes the best notice practicable under the circumstances, including individual notice to all Class Members who can be identified with reasonable effort, and constitutes valid, due, and sufficient notice to Class Members in full compliance with the requirements of applicable law, including the due process clause of the United States Constitution;
3. Declaring the Settlement Agreement to be binding on the opt-in plaintiffs that have not signed the Settlement Agreement but have cashed their settlement checks;
4. Dismissing with prejudice the released claims;
5. Forever discharging defendants from all released claims; and

6. Approving the amount of attorneys' fees and costs to be awarded to plaintiffs' counsel as reasonable and fair.

Respectfully Submitted,

PLAINTIFFS' COUNSEL

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